

COLLECTIVE EXHIBIT A

ALL PLEADINGS AND PROCESS FILED IN SUMNER COUNTY CIRCUIT COURT

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Document 1
1/28/2026 - Complaint

IN THE CIRCUIT COURT FOR SUMNER COUNTY, TENNESSEE

RAY JUSTICE,

Plaintiff,

v.

CITY OF MILLERSVILLE,
TENNESSEE, SHAWN TAYLOR, in his
official and individual capacities, and
BRYAN MORRIS, in his official and
individual capacities,

Defendants.

83CC1 - 20 25 - CV- 102
JURY DEMANDED

FILED
10:30 A M

JAN 28 2025

KATHRYN STRONG, CLERK
BY A D.C.

COMPLAINT

Comes now, the Plaintiff, Ray Justice ("Mr. Justice"), by and through counsel, and for his Complaint against the Defendants, City of Millersville, Tennessee ("Millersville"), Shawn Taylor, in his official and individual capacities ("Chief Taylor"), and Bryan Morris, in his official and individual capacities ("Chief Morris"), states as follows:

I. NATURE OF ACTION

1. This case regards the legal effects and injustice of a soft coup perpetrated on an otherwise unsuspecting, sleepy town in Middle Tennessee. Chief Taylor, a self-described "gypsy cop" and well-known conspiracy theorist, became obsessed with investigating and prosecuting purported child pedophilia rings when he was hired by Chief Morris as the Assistant Chief of Police at the Millersville Police Department ("MPD").

2. The origins of Chief Taylor's obsession apparently began with the long-since debunked "Pizzagate" hoax at the Comet Ping Pong pizzeria in Washington, D.C., involving such notable politicians as Presidential candidate Hillary Rodham Clinton. At all times material hereto, Chief Taylor's actions described herein were known and approved by Chief Morris, Millersville, and its legal counsel at the time, Brian Kroll ("Mr. Kroll"). Accordingly, Chief

Taylor's actions or inactions in this regard constitute the "custom, policy, or practice" of Millersville. *Monell v. Dep't of Soc. Servs.*, 436 U.S. 658, 690-91 (1978). See also *Flagg v. City of Detroit*, 715 F.3d 165, 174 (6th Cir. 2013); *Brokaw v. Mercer County* 253 F.3d 1000 (7th Cir. 2000); *Grech v. Clayton County Ga.*, 288 F.3d 1377 (11th Cir. 2002); *Rookard v Health & Hospitals Corp.*, 710 F.2d 41 (2nd Cir. 1983); *Abasiekong v. Shelby*, 744 F.2d 1055 (4th Cir. 1984); *Burkhart v. Randles*, 764 F.2d 1196 (6th Cir. 1985).

3. Chief Taylor's obsession with investigating child pedophilia rings in Middle Tennessee included, *inter alia*, allegations of aggravated perjury charges in connection with a child sex sting operation Chief Taylor conducted, which was largely comprised of private individuals and Chief Taylor conducting unauthorized and illegal searches into the criminal and financial histories of private Tennessee citizens, to include not only Mr. Justice, but numerous other perceived political enemies of Chief Taylor and/or Chief Morris. These actions ultimately resulted in the initiation of an investigation by the Tennessee Bureau of Investigation ("TBI"), which remains ongoing as of this writing.

4. For his part, Mr. Justice, a City Commissioner for Mt. Juliet, Tennessee, at the time, desired to continue his commitment to public service by assisting Millersville and the MPD with his law enforcement skills. In return for his efforts, Chief Taylor, with the full knowledge and acquiescence of Chief Morris, violated Mr. Justice's Fourth Amendment rights under the U.S. Constitution. Mr. Justice has suffered damages as a direct and proximate result of the Defendants' actions in this regard.

5. Following the initiation of the TBI investigation and a change in the membership of the City Commission, Chief Taylor resigned from Millersville without explanation. Moreover, following a motion by the City Commission to reduce Mr. Kroll's hourly

compensation and a controversy over an alleged conflict of interest regarding his representation of both Chief Taylor and Millersville, Mr. Kroll also resigned without further explanation. The filing of this lawsuit followed.

II. PARTIES

6. Mr. Justice is a resident of Mt. Juliet and citizen of the State of Tennessee.

7. Millersville is a governmental entity organized under the laws of the State of Tennessee, situated in Sumner and Roberston Counties. Millersville may be served with process through its Mayor, Lincoln Atwood, 1246 Louisville Highway, Millersville, Tennessee 37072.

8. Chief Taylor was at all times material hereto an employee of Millersville and operated in his official and individual capacities. Chief Taylor may be served at 2049 Skyhawk Court, White House, Tennessee 37188.

9. Chief Morris is an employee of Millersville and operated in his official and individual capacities. Chief Morris may be served through Mayor Lincoln Atwood, 1246 Louisville Highway, Millersville, Tennessee 37072.

III. FACTS

10. In early 2024, Chief Morris was hired as MPD's Chief of Police and Interim City Manager. In addition, despite having knowledge of Chief Taylor's multiple controversial stints with law enforcement across the State of Tennessee and being generally unqualified, Chief Morris hired Chief Taylor to serve as Millerville's Assistant Chief of Police.

11. Mr. Justice was hired in late 2023 by then-Chief of Police Melvin Brown ("Chief Brown"). Chief Brown and his assistant chief had already resigned before Mr. Justice actually began work for the city in 2024. As a former law enforcement officer, Mr. Justice assisted the MPD with immediately taking corrective action on several POST-commission issues and

reinvigorating a potential grant to MPD from the U.S. Department of Justice. Because of disfunction within Millersville, Mr. Justice shortly resigned from MPD in the same manner as a litany of other public servants before him.

12. While he was employed at MPD, Mr. Justice reported to Detective Trey Burroughs (“Detective Burroughs”). After he left employment, Detective Burroughs informed Mr. Justice that he had been questioned by Chief Taylor regarding Mr. Justice’s background. In addition, Detective Burroughs told Mr. Justice that Chief Taylor had possession of a red binder identified by Mr. Justice’s name, even though he was a private citizen. Chief Taylor had another similar red binder identified by the name of Cristina Templet (“Commissioner Templet”), a City Commissioner who had publicly opposed the retention of Chief Taylor. Finally, Detective Burroughs reported that Chief Taylor had other red binders identified by the names of other perceived political enemies of Chief Taylor and Chief Morris in Millersville, many of which were private citizens, like Mr. Justice.

13. Detective Burroughs further advised that he was unaware of any legitimate criminal investigations ongoing by MPD against Mr. Justice or any of the other identified individuals. Previously, former Mayor Tim Lassiter had been arrested and charged under the leadership of Chief Taylor and Chief Morris at MPD. Those criminal charges, which were unsurprisingly linked by Chief Taylor’s fantasies regarding widespread child pedophilia rings, have all been dropped. In any event, there was no legal basis, and certainly not any authorization, for MPD to be investigating Mr. Justice, who again, was a private citizen at the time.

14. Several months later, the TBI confirmed to Mr. Justice that someone at MPD – presumably Chief Taylor with Chief Morris’s knowledge and approval – had performed illegal and unauthorized searches on Mr. Justice, to include the federal Financial Crimes Enforcement Network (“FinCEN”). In sum, the TBI indicated that Mr. Justice was a victim.

15. Even Mr. Kroll confirmed the performance of such illegal and unauthorized searches at Millersville, although his clients predictably blame other individuals for doing so, in a recent, albeit unnecessarily lengthy federal lawsuit styled *Captain Todd Dorris, et al. v. Kim Kelley, et al.*, U.S. District Court for the Middle District of Tennessee, Case No. 3:25-cv-00052. (“The reports Taylor received further substantiated evidence that the City of Millersville had been conducting improper background checks of various individuals.”) *Id.* at ¶ 43, p. 20. These allegations are also consistent with local media reporting, which indicates that not only were illegal and unauthorized searches conducted against Mr. Justice, a private citizen, but they were also initiated against several other perceived political enemies of Chief Taylor and Chief Morris to include, but not be limited to, U.S. Senators, District Attorney’s General, and even sitting state Circuit Court judges. Accordingly, the TBI reportedly restricted MPD’s access to certain information databases.

16. Based on these allegations, Mr. Justice asserts a claim for damages against the Defendants, jointly and severally, pursuant to 42 U.S.C. § 1983 under the Fourth and Fourteenth Amendments to the U.S. Constitution and other legal theories.

IV. CAUSES OF ACTION

Count 1: Fourth Amendment and 42 U.S.C. § 1983 (Chief Taylor and Chief Morris)

17. Mr. Justice re-alleges and incorporates herein by reference Paragraphs 1 through 16 of the Complaint.

18. The aforementioned actions by Chief Taylor, with full knowledge and acquiescence by Chief Morris, violated the Fourth Amendment to the U.S. Constitution as applied through 42 U.S.C. § 1983. The Fourth Amendment guarantees that government officials, such as Chief Taylor and Chief Morris, may not subject private citizens, like Mr. Justice, to unreasonable searches and seizures without proper authorization.

19. Chief Taylor, with Chief Morris's full knowledge and approval, performed illegal and unauthorized searches on Mr. Justice, to include the federal FinCEN database. As a result, Mr. Justice has suffered damages.

Count 2: Monell Liability (Millersville)

20. Mr. Justice re-alleges and incorporates herein by reference Paragraphs 1 through 19 of the Complaint.

21. At all times material hereto, Chief Taylor's actions, as a self-described "gypsy cop," to include, *inter alia*, performing illegal and unauthorized searches on perceived political enemies of Chief Taylor and Chief Morris, such as Mr. Justice, were known and approved by Chief Morris, Millersville, and Millersville's City Attorney, Mr. Kroll. In fact, local media reports indicated that even Mr. Kroll partook in similar searches, together with Chief Taylor, through use of his former law firm's resources without its knowledge or authorization. Finally, albeit in a pique of gaslighting, Mr. Kroll's clients confirmed Millersville's policy in this regard in a recent federal court filing. ("The reports Taylor received further substantiated evidence that

the City of Millersville had been conducting improper background checks of various individuals.”) *Id.* at ¶ 43, p. 20.

22. Accordingly, Chief Taylor’s actions or inactions in this regard constituted the “custom, policy, or practice” of Millersville. *Monell v. Dep’t of Soc. Servs.*, 436 U.S. 658, 690-91 (1978). *See also* *Flagg v. City of Detroit*, 715 F.3d 165, 174 (6th Cir. 2013); *Brokaw v. Mercer County* 253 F.3d 1000 (7th Cir. 2000); *Grech v. Clayton County Ga.*, 288 F.3d 1377 (11th Cir. 2002); *Rookard v Health & Hospitals Corp.*, 710 F.2d 41 (2nd Cir. 1983); *Abasiekong v. Shelby*, 744 F.2d 1055 (4th Cir. 1984); *Burkhart v. Randles*, 764 F.2d 1196 (6th Cir. 1985).

23. More specifically, Millersville had a municipal policy that existed at all times material hereto whereby illegal and unauthorized searches, to include the federal Financial Crimes Enforcement Network (“FinCEN”) database, were performed on perceived political enemies of Chief Taylor and Chief Morris. Moreover, this policy was the moving force behind the Fourth Amendment constitutional violations and damages complained about by Mr. Justice here. *City of Canton v. Harris*, 489 U.S. 378, 389 (1989). Both of these elements have been further confirmed by Millersville’s City Attorney, although his clients depict Chief Taylor as something of a small-town Eliott Ness, uprooting perceived political corruption in Millersville one illegal search at a time. *See supra*.

Count 3: Negligent Hiring (Millersville)

24. Mr. Justice re-alleges and incorporates herein by reference Paragraphs 1 through 23 of the Complaint.

25. Millersville was negligent in hiring Chief Taylor and Chief Morris. In particular, Millersville owed Mr. Justice, as a private citizen, a duty of care, engaged in conduct below the

applicable standard of care to the extent that it amounted to a breach of this duty, and Mr. Justice suffered damages, which were directly and proximately caused by said breach.

26. Chief Taylor was a self-described “gypsy cop” and well-known conspiracy theorist, who became obsessed with investigating and prosecuting purported child pedophilia rings apparently originating with the debunked “Pizzagate” hoax at the Comet Ping Pong pizzeria in Washington, D.C. Chief Taylor’s fantasies regarding such bizarre topics ballooned far beyond mere private political beliefs and resulted in, *inter alia*, allegations of aggravated perjury charges in connection with a child sex sting operation Chief Taylor conducted, which was largely comprised of private individuals and Chief Taylor conducting unauthorized and illegal searches into the criminal and financial histories of private Tennessee citizens, to include Mr. Justice, and many other perceived political enemies of Chief Taylor and Chief Morris, including Senators, District Attorney’s General, and even sitting Circuit Court judges. For his part, Chief Morris knew and approved of all foregoing actions by Chief Taylor.

27. In short, Chief Taylor was manifestly unfit to perform the job of Assistant Chief of Police, or any job in law enforcement, in that he possessed a predisposition to conduct law enforcement work negligently. If hired, Chief Taylor posed an unreasonable risk to others, including Mr. Justice, a fact well-known to Chief Morris.

28. Moreover, Chief Morris was also unfit to perform the job of Chief of Police, in that he possessed a predisposition to conduct and supervise law enforcement work negligently. If hired, Chief Morris posed an unreasonable risk to others, including Mr. Justice.

29. Millersville knew or should have known about Chief Taylor’s and Chief Morris’s unfitness to perform the job for which they were to be employed at the time they were hired, particularly as it relates to conducting law enforcement in a supervisory capacity.

30. Millersville owed Mr. Justice a duty not to hire negligent employees, like Chief Taylor and Chief Morris, who are unfit to perform the job for which they were employed.

31. By hiring Chief Taylor and Chief Morris, Millersville engaged in conduct below the applicable standard of care to the extent that it amounted to a breach of its duty, which directly and proximately caused damage to Mr. Justice.

Count 4: Negligent Retention (Millersville)

32. Mr. Justice re-alleges and incorporates herein by reference Paragraphs 1 through 31 of the Complaint.

33. Millersville was negligent in hiring and retaining Chief Taylor and Chief Morris. In particular, Millersville owed Mr. Justice, as a private citizen, a duty of care, engaged in conduct below the applicable standard of care to the extent that it amounted to a breach of this duty, and Mr. Justice suffered damages, which were directly and proximately caused by said breach.

34. Chief Taylor was a self-described “gypsy cop” and well-known conspiracy theorist, who became obsessed with investigating and prosecuting purported child pedophilia rings apparently originating with the debunked “Pizzagate” hoax at the Comet Ping Pong pizzeria in Washington, D.C. Chief Taylor’s fantasies regarding such bizarre topics ballooned far beyond mere private political beliefs and resulted in, *inter alia*, allegations of aggravated perjury charges in connection with a child sex sting operation Chief Taylor conducted, which was largely comprised of private individuals and Chief Taylor conducting unauthorized and illegal searches into the criminal and financial histories of private Tennessee citizens, to include Mr. Justice, and many other perceived political enemies of Chief Taylor and Chief Morris,

including Senators, District Attorney's General, and even sitting Circuit Court judges. For his part, Chief Morris knew and approved of all foregoing actions by Chief Taylor.

35. In short, Chief Taylor was manifestly unfit to perform the job of Assistant Chief of Police, or any job in law enforcement, in that he possessed a predisposition to conduct law enforcement work negligently. If hired, Chief Taylor posed an unreasonable risk to others, including Mr. Justice.

36. Moreover, Chief Morris was also unfit to perform the job of Chief of Police, in that he possessed a predisposition to conduct and supervise law enforcement work negligently. If hired, Chief Morris posed an unreasonable risk to others, including Mr. Justice.

37. Millersville knew or should have known about Chief Taylor's and Chief Morris's unfitness to perform the job for which they were to be employed at the time they were hired, particularly as it relates to conducting law enforcement in a supervisory capacity.

38. Millersville owed Mr. Justice a duty not to hire negligent employees, like Chief Taylor and Chief Morris, who are unfit to perform the job for which they were employed.

39. By hiring Chief Taylor and Chief Morris, Millersville engaged in conduct below the applicable standard of care to the extent that it amounted to a breach of its duty, which directly and proximately caused damage to Mr. Justice.

40. Millersville also owed Mr. Justice a duty not to retain Chief Taylor or Chief Morris to protect Mr. Justice, a private citizen, from damage caused by their negligent conduct and their unfitness to perform the jobs for which they were employed. This is particularly true after local media reports surfaced regarding the actions of Chief Taylor and Chief Morris, not to mention the ongoing TBI investigation and public inquiry by the City Commission.

41. By retaining Chief Taylor or Chief Morris after they were hired, and particularly after the flood of local media reports, TBI investigation, and scrutiny by the City Commission, Millersville engaged in conduct far below the applicable standard of care to the extent that it amounted to a breach of its duty, which directly and proximately caused damage to Mr. Justice. It was manifestly unreasonable for Millersville to keep either Chief Taylor or Chief Morris employed, but it did so.

Count 5: Failure to Train/Negligent Supervision

42. Mr. Justice re-alleges and incorporates herein by reference Paragraphs 1 through 41 of the Complaint.

43. Millersville was negligent in hiring Chief Taylor and Chief Morris. In particular, Millersville owed Mr. Justice, a private citizen, a duty of care, engaged in conduct below the applicable standard of care to the extent that it amounted to a breach of his duty, and Mr. Justice suffered damages, which were directly and proximately caused by said breach.

44. Chief Taylor was a self-described “gypsy cop” and well-known conspiracy theorist, who became obsessed with investigating and prosecuting purported child pedophilia rings apparently originating with the debunked “Pizzagate” hoax at the Comet Ping Pong pizzeria in Washington, D.C. Chief Taylor’s fantasies regarding such bizarre topics ballooned far beyond mere private political beliefs and resulted in, *inter alia*, allegations of aggravated perjury charges in connection with a child sex sting operation Chief Taylor conducted, which was largely comprised of private individuals and Chief Taylor conducting unauthorized and illegal searches into the criminal and financial histories of private Tennessee citizens, to include Mr. Justice, and many other perceived political enemies of Chief Taylor and Chief Morris,

including Senators, District Attorney's General, and even sitting Circuit Court judges. For his part, Chief Morris knew and approved of all foregoing actions by Chief Taylor.

45. In short, Chief Taylor was unfit to perform the job of Assistant Chief of Police, or any job in law enforcement, in that he possessed a predisposition to conduct law enforcement work negligently. If hired, Chief Taylor posed an unreasonable risk to others, including Mr. Justice.

46. Moreover, Chief Morris was also unfit to perform the job of Chief of Police, in that he possessed a predisposition to conduct and supervise law enforcement work negligently. If hired, Chief Morris posed an unreasonable risk to others, including Mr. Justice.

47. Millersville knew or should have known about Chief Taylor's and Chief Morris's unfitness to perform the job for which they were to be employed at the time they were hired, particularly as it relates to conducting law enforcement in a supervisory capacity.

48. Millersville owed Mr. Justice a duty not to hire negligent employees, like Chief Taylor and Chief Morris, who are unfit to perform the job for which they were employed.

49. By hiring Chief Taylor and Chief Morris, Millersville engaged in conduct below the applicable standard of care to the extent that it amounted to a breach of its duty, which directly and proximately caused damages to Mr. Justice.

50. Millersville owed Mr. Justice a duty to train and supervise Chief Taylor and Chief Morris to protect Mr. Justice from damage caused by their negligent conduct and their unfitness to perform the jobs for which they were employed.

51. Millersville failed to adequately train and/or supervise Chief Taylor and Chief Morris. Such failure constitutes conduct below the applicable standard of care to the extent that it amounts to a breach of its duty, which directly and proximately caused damage to Mr. Justice.

V. PRAYER FOR RELIEF

WHEREFORE, Mr. Justice prays for the following relief:

A. Process be issued and this Complaint be served upon each of the Defendants requiring them to respond;

B. Compensatory damages against the Defendants, jointly and severally, in the amount of \$5,000,000.00;

C. Punitive damages against Chief Taylor and Chief Morris individually because their conduct was motivated by evil motive or intent or involved reckless or callous indifference to the federally protected rights of Mr. Justice in the amount of \$1,500,000.00. *King v. Zamara*, 788 F.3d 207, 216 (6th Cir. 2015);

D. A jury trial of all issues triable by a jury of twelve; and,

D. For such other, further, and general relief as to which Mr. Justice may show himself to be entitled upon a hearing in this cause.

Respectfully submitted,

/s/ Ben M. Rose

Ben M. Rose (#21254)
RoseFirm, PLLC
Post Office Box 1108
Brentwood, Tennessee 37024
615-942-8295
ben@rosefirm.com

Attorney for the Plaintiff, Ray Justice

Document 2
2/3/2025 Summons Returned Not Served
Bryan Morris - Individual Capacity

ORIGINAL

CIRCUIT COURT CIVIL SUMMONS

SUMNER COUNTY

STATE OF TENNESSEE

FILED 107 18TH JUDICIAL DISTRICT

FEB 04 2025

Ray Justice

KATHRYN STRONG, CLERK

BY D.C.

Plaintiff(s)

vs. Case # 83CC1 - 20 25 - CV - 102

Bryan Morris Individually
1246 Louisville Hwy
Millersville, TN 37072

Defendant(s)

☒ ORIGINAL

☐ ALIAS

☐ PLURIES

☒ Sumner County Sheriff (\$)

☐ Out of County Sheriff (\$)

☐ Secretary of State (\$)

☐ Commissioner of Insurance (\$)

☐ Private Process Server

☐ Certified Mail

(\$ Attach Required Fees

TO THE ABOVE-NAMED DEFENDANT: Bryan Morris, Individual Capacity

You are hereby summoned and required to defend a civil action by filing your answer with the Clerk of the Court and serving a copy of your answer to the Complaint on the plaintiff's attorney at the address below. Your defense must be made within thirty (30) days from the date this summons is served upon you, exclusive of the day of service. If you fail to defend this action by the above date, judgment by default can be rendered against you for the relief demanded in the complaint.

Issued: Jan 28, 20 25.

KATHRYN STRONG, CLERK

By: [Signature] D.C.

ATTORNEY FOR PLAINTIFF

OR PLAINTIFF'S ADDRESS:

Name: Ben M. Rose, RoseFirm, PLLC

Address: Post Office Box 1108, Brentwood, Tennessee 37061

TO THE DEFENDANT(S): NOTICE: Pursuant to Chapter 919 of the Public Acts of 1980, you are hereby given the following notice: Tennessee law provides a ten thousand dollar (\$10,000) personal property exemption from execution or seizure to satisfy a judgment. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the Clerk of the Court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed. These include items of necessary wearing apparel (clothing) for yourself and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible and school books. Should any of these items be seized, you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer.

CERTIFICATION (IF APPLICABLE)

I, KATHRYN STRONG, Circuit Court Clerk, Sumner County, Tennessee, certify this to be a true and correct copy of the original Summons issued in this case.

KATHRYN STRONG, CLERK

Date: _____

By: _____ D.C.



If you require assistance or modification due to a qualified disability, please contact the ADA Coordinator, Kim White at 615-451-6023.

RETURN ON SERVICE OF SUMMONS

I hereby certify and return that on the 3 day of Feb, 2025, I:

☐ Served this Summons and Complaint/Petition on the following Defendant, _____
_____ in the following manner: _____.

☒ Failed to serve this Summons because Bryan Morris is not to be found
in this County after diligent search and inquiry for the following reason(s): No longer employed
& located.

This the 3 day of Feb, 2025.

[Signature]
DEPUTY SHERIFF/PROCESS SERVER

RETURN ON SERVICE OF SUMMONS BY MAIL

I hereby certify and return, that on the ___ day of _____, 20 __, I sent, postage prepaid,
by registered return receipt mail or certified return receipt mail, a certified copy of the summons and a
copy of the complaint in the above-styled case, to the defendant, _____.
On _____ I received the return receipt for said registered or
certified mail, which had been signed by _____ on _____.
Said return receipt is attached to this original summons and both documents are being sent herewith to
the Circuit Court Clerk for filing.

By: _____
PLAINTIFF, PLAINTIFF'S ATTORNEY
OR OTHER PERSON AUTHORIZED BY
STATUTE TO SERVE PROCESS

Sworn to and subscribed before me on this
_____ day of _____, 20____.

Notary Public or _____ Deputy Clerk
My Commission Expires: _____

**ATTACH
RETURN RECEIPT
HERE
(IF APPLICABLE)**

Served by (Print) Stinson
Process Server, S.C.S.O. 117 W. Smith St.
Gallatin, TN 37066 (615)442-1826



COPY

CIRCUIT COURT CIVIL SUMMONS

SUMNER COUNTY

STATE OF TENNESSEE
18TH JUDICIAL DISTRICT☒ ORIGINAL☐ ALIAS☐ PLURIES

Ray Justice

Plaintiff(s)

vs. Case # 83CC1 - 2025 - CV- 102

Bryan Morris Individual Capacity
1246 Louisville Hwy
Millersville TN 37072

Defendant(s)

- ☒ Sumner County Sheriff (\$)
☐ Out of County Sheriff (\$)
☐ Secretary of State (\$)
☐ Commissioner of Insurance (\$)
☐ Private Process Server
☐ Certified Mail
 (\$ Attach Required Fees

TO THE ABOVE-NAMED DEFENDANT: Bryan Morris, Individual Capacity

You are hereby summoned and required to defend a civil action by filing your answer with the Clerk of the Court and serving a copy of your answer to the Complaint on the plaintiff's attorney at the address below. Your defense must be made within thirty (30) days from the date this summons is served upon you, exclusive of the day of service. If you fail to defend this action by the above date, judgment by default can be rendered against you for the relief demanded in the complaint.

Issued: Jan. 28, 2025.

KATHRYN STRONG, CLERK

By: Ben M. Rose D.C.

ATTORNEY FOR PLAINTIFF

OR PLAINTIFF'S ADDRESS:

Name: Ben M. Rose, RoseFirm, PLLC

Address: Post Office Box 1108, Brentwood, Tennessee 37041

TO THE DEFENDANT(S): NOTICE: Pursuant to Chapter 919 of the Public Acts of 1980, you are hereby given the following notice: Tennessee law provides a ten thousand dollar (\$10,000) personal property exemption from execution or seizure to satisfy a judgment. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the Clerk of the Court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed. These include items of necessary wearing apparel (clothing) for yourself and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible and school books. Should any of these items be seized, you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer.

CERTIFICATION (IF APPLICABLE)

I, KATHRYN STRONG, Circuit Court Clerk, Sumner County, Tennessee, certify this to be a true and correct copy of the original Summons issued in this case.

KATHRYN STRONG, CLERK

Date: _____

By: _____ D.C.



If you require assistance or modification due to a qualified disability, please contact the ADA Coordinator, Kim White at 615-451-6023.

RETURN ON SERVICE OF SUMMONS

I hereby certify and return that on the _____ day of _____, 20____, I:

☐ Served this Summons and Complaint/Petition on the following Defendant, _____
_____ in the following manner: _____.

☐ Failed to serve this Summons because _____ is not to be found
in this County after diligent search and inquiry for the following reason(s): _____.

This the _____ day of _____, 20____.

DEPUTY SHERIFF/PROCESS SERVER

RETURN ON SERVICE OF SUMMONS BY MAIL

I hereby certify and return, that on the __ day of _____, 20 __, I sent, postage prepaid,
by registered return receipt mail or certified return receipt mail, a certified copy of the summons and a
copy of the complaint in the above-styled case, to the defendant, _____.

On _____ I received the return receipt for said registered or
certified mail, which had been signed by _____ on _____.

Said return receipt is attached to this original summons and both documents are being sent herewith to
the Circuit Court Clerk for filing.

By: _____
PLAINTIFF, PLAINTIFF'S ATTORNEY
OR OTHER PERSON AUTHORIZED BY
STATUTE TO SERVE PROCESS

Sworn to and subscribed before me on this
_____ day of _____, 20____.

Notary Public or _____ Deputy Clerk
My Commission Expires: _____

**ATTACH
RETURN RECEIPT
HERE
(IF APPLICABLE)**

Document 3
2/3/2025 Summons Returned Not Served
Bryan Morris Official Capacity

ORIGINAL

CIRCUIT COURT CIVIL SUMMONS

SUMNER COUNTY

STATE OF TENNESSEE

☒ ORIGINAL

FILED 18TH JUDICIAL DISTRICT

☐ ALIAS

FEB 04 2025

☐ PLURIES

Ray Justice

KATHRYN STRONG, CLERK

BY

Plaintiff(s)

- ☒ Sumner County Sheriff (\$)
☐ Out of County Sheriff (\$)
☐ Secretary of State (\$)
☐ Commissioner of Insurance (\$)
☐ Private Process Server
☐ Certified Mail
(\$ Attach Required Fees)

vs.

Case # 83CC1 - 20 25 - CV- 102

Bryan Morris Official Capacity
c/o Mayor Lincoln Atwood
1246 Louisville Hwy, Millersville TN
37072

Defendant(s)



TO THE ABOVE-NAMED DEFENDANT: Bryan Morris, Official Capacity

You are hereby summoned and required to defend a civil action by filing your answer with the Clerk of the Court and serving a copy of your answer to the Complaint on the plaintiff's attorney at the address below. Your defense must be made within thirty (30) days from the date this summons is served upon you, exclusive of the day of service. If you fail to defend this action by the above date, judgment by default can be rendered against you for the relief demanded in the complaint.

Issued: Jan 28, 20 25.

KATHRYN STRONG, CLERK

By: [Signature] D.C.

ATTORNEY FOR PLAINTIFF

OR PLAINTIFF'S ADDRESS:

Name: Ben M. Rose, RoseFirm, PLLC

Address: Post Office Box 1108, Brentwood, Tennessee 3702

TO THE DEFENDANT(S): NOTICE: Pursuant to Chapter 919 of the Public Acts of 1980, you are hereby given the following notice: Tennessee law provides a ten thousand dollar (\$10,000) personal property exemption from execution or seizure to satisfy a judgment. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the Clerk of the Court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed. These include items of necessary wearing apparel (clothing) for yourself and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible and school books. Should any of these items be seized, you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer.

CERTIFICATION (IF APPLICABLE)

I, KATHRYN STRONG, Circuit Court Clerk, Sumner County, Tennessee, certify this to be a true and correct copy of the original Summons issued in this case.

KATHRYN STRONG, CLERK

Date: _____

By: _____ D.C.



If you require assistance or modification due to a qualified disability, please contact the ADA Coordinator, Kim White at 615-451-6023.

RETURN ON SERVICE OF SUMMONS

I hereby certify and return that on the 3 day of Feb, 2025, I:

☐ Served this Summons and Complaint/Petition on the following Defendant, _____
_____ in the following manner: _____.

☒ Failed to serve this Summons because Byron Morris is not to be found
in this County after diligent search and inquiry for the following reason(s): no longer employed
e location.

This the 3 day of Feb, 2025.


DEPUTY SHERIFF/PROCESS SERVER

RETURN ON SERVICE OF SUMMONS BY MAIL

I hereby certify and return, that on the ___ day of _____, 20 __, I sent, postage prepaid,
by registered return receipt mail or certified return receipt mail, a certified copy of the summons and a
copy of the complaint in the above-styled case, to the defendant, _____.

On _____ I received the return receipt for said registered or
certified mail, which had been signed by _____ on _____.

Said return receipt is attached to this original summons and both documents are being sent herewith to
the Circuit Court Clerk for filing.

By: _____
PLAINTIFF, PLAINTIFF'S ATTORNEY
OR OTHER PERSON AUTHORIZED BY
STATUTE TO SERVE PROCESS

Sworn to and subscribed before me on this
_____ day of _____, 20____.

Notary Public or _____ Deputy Clerk
My Commission Expires: _____

**ATTACH
RETURN RECEIPT
HERE
(IF APPLICABLE)**

Served by (Print) Stinson
Process Server, S.C.S.O. 117 W. Smith St.
Gallatin, TN 37066 (615)442-1826



COPY

CIRCUIT COURT CIVIL SUMMONS

SUMNER COUNTY

STATE OF TENNESSEE
18TH JUDICIAL DISTRICT

☒ ORIGINAL

☐ ALIAS

☐ PLURIES

Ray Justice

Plaintiff(s)

vs. Case # 83CC1 - 20 25 - CV- 102

Bryan Morris, Official Capacity
To Mayor Lincoln Atwood
1246 Louisville Hwy, Millersville TN
77072
Defendant(s)

- ☒ Sumner County Sheriff (\$)
☐ Out of County Sheriff (\$)
☐ Secretary of State (\$)
☐ Commissioner of Insurance (\$)
☐ Private Process Server
☐ Certified Mail
(S) Attach Required Fees

TO THE ABOVE-NAMED DEFENDANT: Bryan Morris, Official Capacity

You are hereby summoned and required to defend a civil action by filing your answer with the Clerk of the Court and serving a copy of your answer to the Complaint on the plaintiff's attorney at the address below. Your defense must be made within thirty (30) days from the date this summons is served upon you, exclusive of the day of service. If you fail to defend this action by the above date, judgment by default can be rendered against you for the relief demanded in the complaint.

Issued: Jan 28, 20 25

KATHRYN STRONG, CLERK

By: Sheehan D.C.

ATTORNEY FOR PLAINTIFF

OR PLAINTIFF'S ADDRESS:

Name: Ben M. Rose, RoseFirm, PLLC

Address: Post Office Box 1108, Brentwood, Tennessee 3702

TO THE DEFENDANT(S): NOTICE: Pursuant to Chapter 919 of the Public Acts of 1980, you are hereby given the following notice: Tennessee law provides a ten thousand dollar (\$10,000) personal property exemption from execution or seizure to satisfy a judgment. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the Clerk of the Court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed. These include items of necessary wearing apparel (clothing) for yourself and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible and school books. Should any of these items be seized, you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer.

CERTIFICATION (IF APPLICABLE)

I, KATHRYN STRONG, Circuit Court Clerk, Sumner County, Tennessee, certify this to be a true and correct copy of the original Summons issued in this case.

KATHRYN STRONG, CLERK

Date: _____

By: _____ D.C.



If you require assistance or modification due to a qualified disability, please contact the ADA Coordinator, Kim White at 615-451-6023.

RETURN ON SERVICE OF SUMMONS

I hereby certify and return that on the ____ day of _____, 20____, I:

☐ Served this Summons and Complaint/Petition on the following Defendant, _____
_____ in the following manner: _____.

☐ Failed to serve this Summons because _____ is not to be found
in this County after diligent search and inquiry for the following reason(s): _____.

This the ____ day of _____, 20____.

DEPUTY SHERIFF/PROCESS SERVER

RETURN ON SERVICE OF SUMMONS BY MAIL

I hereby certify and return, that on the __ day of _____, 20 __, I sent, postage prepaid,
by registered return receipt mail or certified return receipt mail, a certified copy of the summons and a
copy of the complaint in the above-styled case, to the defendant, _____.

On _____ I received the return receipt for said registered or
certified mail, which had been signed by _____ on _____.

Said return receipt is attached to this original summons and both documents are being sent herewith to
the Circuit Court Clerk for filing.

By: _____
PLAINTIFF, PLAINTIFF'S ATTORNEY
OR OTHER PERSON AUTHORIZED BY
STATUTE TO SERVE PROCESS

Sworn to and subscribed before me on this
_____ day of _____, 20____.

Notary Public or _____ Deputy Clerk
My Commission Expires: _____

**ATTACH
RETURN RECEIPT
HERE
(IF APPLICABLE)**

Document 4
2/3/2025 Summons Returned Not Served
Shawn Taylor Official Capacity

 ORIGINAL

CIRCUIT COURT CIVIL SUMMONS

SUMNER COUNTY

STATE OF TENNESSEE

FILED 18TH JUDICIAL DISTRICT

907a M

☒ ORIGINAL

☐ ALIAS

☐ PLURIES

Ray Justice

FEB 04 2025

KATHRYN STRONG, CLERK

BY Plaintiff(s)  D.C.

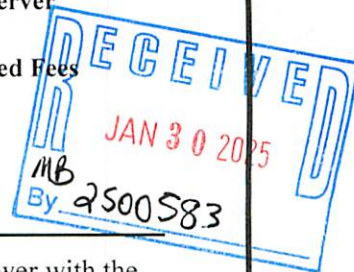
vs.

Case # 83CC1 - 20 25 - CV- 102

Shawn Taylor, Official Capacity
2049 Skyhawk Court
White House, TN 37188

Defendant(s)

- ☒ Sumner County Sheriff (\$)
☐ Out of County Sheriff (\$)
☐ Secretary of State (\$)
☐ Commissioner of Insurance (\$)
☐ Private Process Server
☐ Certified Mail
(S) Attach Required Fees



TO THE ABOVE-NAMED DEFENDANT: Shawn Taylor, Official Capacity

You are hereby summoned and required to defend a civil action by filing your answer with the Clerk of the Court and serving a copy of your answer to the Complaint on the plaintiff's attorney at the address below. Your defense must be made within thirty (30) days from the date this summons is served upon you, exclusive of the day of service. If you fail to defend this action by the above date, judgment by default can be rendered against you for the relief demanded in the complaint.

Issued: Jan 28, 20 25

KATHRYN STRONG, CLERK

By: Phreehand D.C.

ATTORNEY FOR PLAINTIFF

OR PLAINTIFF'S ADDRESS:

Name: Ben M. Rose, RoseFirm, PLLC

Address: Post Office Box 1108, Brentwood, Tennessee 37041

TO THE DEFENDANT(S): NOTICE: Pursuant to Chapter 919 of the Public Acts of 1980, you are hereby given the following notice: Tennessee law provides a ten thousand dollar (\$10,000) personal property exemption from execution or seizure to satisfy a judgment. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the Clerk of the Court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed. These include items of necessary wearing apparel (clothing) for yourself and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible and school books. Should any of these items be seized, you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer.

CERTIFICATION (IF APPLICABLE)

I, KATHRYN STRONG, Circuit Court Clerk, Sumner County, Tennessee, certify this to be a true and correct copy of the original Summons issued in this case.

KATHRYN STRONG, CLERK

Date: _____

By: _____ D.C.



If you require assistance or modification due to a qualified disability, please contact the ADA Coordinator, Kim White at 615-451-6023.

RETURN ON SERVICE OF SUMMONS

I hereby certify and return that on the 3rd day of February, 2025, I:

☐ Served this Summons and Complaint/Petition on the following Defendant, _____
_____ in the following manner: _____.

☒ Failed to serve this Summons because Shawn Taylor for Capital ^{official} is not to be found
in this County after diligent search and inquiry for the following reason(s): Said address is
not in Sumner Co. TN.

This the 3rd day of February, 2025.

Pick Thompson
S.C.S.O. 117 W. Smith St.
Gallatin, TN 37068
815-452-2818

R. Thompson #209
DEPUTY SHERIFF/PROCESS SERVER

RETURN ON SERVICE OF SUMMONS BY MAIL

I hereby certify and return, that on the ___ day of _____, 20 __, I sent, postage prepaid,
by registered return receipt mail or certified return receipt mail, a certified copy of the summons and a
copy of the complaint in the above-styled case, to the defendant, _____.

On _____ I received the return receipt for said registered or
certified mail, which had been signed by _____ on _____.

Said return receipt is attached to this original summons and both documents are being sent herewith to
the Circuit Court Clerk for filing.

By: _____
PLAINTIFF, PLAINTIFF'S ATTORNEY
OR OTHER PERSON AUTHORIZED BY
STATUTE TO SERVE PROCESS

Sworn to and subscribed before me on this
_____ day of _____, 20____.

Notary Public or _____ Deputy Clerk
My Commission Expires: _____

**ATTACH
RETURN RECEIPT
HERE
(IF APPLICABLE)**



COPY

CIRCUIT COURT CIVIL SUMMONS

SUMNER COUNTY

STATE OF TENNESSEE
18TH JUDICIAL DISTRICT☒ ORIGINAL
☐ ALIAS
☐ PLURIES

Ray Justice

Plaintiff(s)

vs. Case # 83CC1 - 20 25 - CV- 102Shawn Taylor Official Capacity
2049 Skyhawk Court
White House, TN 37188

Defendant(s)

☒ Sumner County Sheriff (\$)
☐ Out of County Sheriff (\$)
☐ Secretary of State (\$)
☐ Commissioner of Insurance (\$)
☐ Private Process Server
☐ Certified Mail
(\$ Attach Required Fees)TO THE ABOVE-NAMED DEFENDANT: Shawn Taylor, Official Capacity

You are hereby summoned and required to defend a civil action by filing your answer with the Clerk of the Court and serving a copy of your answer to the Complaint on the plaintiff's attorney at the address below. Your defense must be made within thirty (30) days from the date this summons is served upon you, exclusive of the day of service. If you fail to defend this action by the above date, judgment by default can be rendered against you for the relief demanded in the complaint.

Issued: Jan. 28, 20 25.

KATHRYN STRONG, CLERK

By: Shepherd D.C.ATTORNEY FOR PLAINTIFF
OR PLAINTIFF'S ADDRESS:

Name: Ben M. Rose, RoseFirm, PLLC

Address: Post Office Box 1108, Brentwood, Tennessee 37061

TO THE DEFENDANT(S): NOTICE: Pursuant to Chapter 919 of the Public Acts of 1980, you are hereby given the following notice: Tennessee law provides a ten thousand dollar (\$10,000) personal property exemption from execution or seizure to satisfy a judgment. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the Clerk of the Court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed. These include items of necessary wearing apparel (clothing) for yourself and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible and school books. Should any of these items be seized, you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer.

CERTIFICATION (IF APPLICABLE)

I, KATHRYN STRONG, Circuit Court Clerk, Sumner County, Tennessee, certify this to be a true and correct copy of the original Summons issued in this case.

KATHRYN STRONG, CLERK

Date: _____

By: _____ D.C.



If you require assistance or modification due to a qualified disability, please contact the ADA Coordinator, Kim White at 615-451-6023.

RETURN ON SERVICE OF SUMMONS

I hereby certify and return that on the ____ day of _____, 20____, I:

☐ Served this Summons and Complaint/Petition on the following Defendant, _____
_____ in the following manner: _____.

☐ Failed to serve this Summons because _____ is not to be found
in this County after diligent search and inquiry for the following reason(s): _____
_____.

This the ____ day of _____, 20____.

DEPUTY SHERIFF/PROCESS SERVER

RETURN ON SERVICE OF SUMMONS BY MAIL

I hereby certify and return, that on the __ day of _____, 20 __, I sent, postage prepaid,
by registered return receipt mail or certified return receipt mail, a certified copy of the summons and a
copy of the complaint in the above-styled case, to the defendant, _____.

On _____ I received the return receipt for said registered or
certified mail, which had been signed by _____ on _____.

Said return receipt is attached to this original summons and both documents are being sent herewith to
the Circuit Court Clerk for filing.

By: _____
PLAINTIFF, PLAINTIFF'S ATTORNEY
OR OTHER PERSON AUTHORIZED BY
STATUTE TO SERVE PROCESS

Sworn to and subscribed before me on this
____ day of _____, 20____.

____ Notary Public or ____ Deputy Clerk
My Commission Expires: _____

**ATTACH
RETURN RECEIPT
HERE
(IF APPLICABLE)**

Document 5
2/3/2025 Summons Returned Served
City of Millersville

 ORIGINAL

CIRCUIT COURT CIVIL SUMMONS

SUMNER COUNTY

STATE OF TENNESSEE

FILED 18TH JUDICIAL DISTRICT

☒ ORIGINAL

☐ ALIAS

☐ PLURIES

Ray Justice

FEB 04 2025

KATHRYN STRONG, CLERK

BY

Plaintiff(s)

vs.

Case # 83CC1 - 20 25 - CV- 102

City of Millersville, Tennessee, et al.

To Mayor Lincoln Atwood
1246 Louisville Hwy, Millersville, TN

Defendant(s) 87072

- ☒ Sumner County Sheriff (\$)
☐ Out of County Sheriff (\$)
☐ Secretary of State (\$)
☐ Commissioner of Insurance (\$)
☐ Private Process Server
☐ Certified Mail
(\$ Attach Required Fees)

TO THE ABOVE-NAMED DEFENDANT: City of Millersville, Tennessee

You are hereby summoned and required to defend a civil action by filing your answer with the Clerk of the Court and serving a copy of your answer to the Complaint on the plaintiff's attorney at the address below. Your defense must be made within thirty (30) days from the date this summons is served upon you, exclusive of the day of service. If you fail to defend this action by the above date, judgment by default can be rendered against you for the relief demanded in the complaint.

Issued: Jan 28, 20 25.

KATHRYN STRONG, CLERK

By:  D.C.

ATTORNEY FOR PLAINTIFF

OR PLAINTIFF'S ADDRESS:

Name: Ben M. Rose, RoseFirm, PLLC

Address: Post Office Box 1108, Brentwood, Tennessee 3702

TO THE DEFENDANT(S): NOTICE: Pursuant to Chapter 919 of the Public Acts of 1980, you are hereby given the following notice: Tennessee law provides a ten thousand dollar (\$10,000) personal property exemption from execution or seizure to satisfy a judgment. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the Clerk of the Court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed. These include items of necessary wearing apparel (clothing) for yourself and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible and school books. Should any of these items be seized, you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer.

CERTIFICATION (IF APPLICABLE)

I, KATHRYN STRONG, Circuit Court Clerk, Sumner County, Tennessee, certify this to be a true and correct copy of the original Summons issued in this case.

KATHRYN STRONG, CLERK

Date: _____

By: _____ D.C.



If you require assistance or modification due to a qualified disability, please contact the ADA Coordinator, Kim White at 615-451-6023.

RETURN ON SERVICE OF SUMMONS

I hereby certify and return that on the 3 day of Feb, 2025, I:

☒ Served this Summons and Complaint/Petition on the following Defendant, Lincoln
Atwood in the following manner: Served copy in person.

☐ Failed to serve this Summons because _____ is not to be found
in this County after diligent search and inquiry for the following reason(s): _____

This the 3 day of Feb, 2025.

[Signature]
DEPUTY SHERIFF/PROCESS SERVER

RETURN ON SERVICE OF SUMMONS BY MAIL

I hereby certify and return, that on the ___ day of _____, 20 __, I sent, postage prepaid,
by registered return receipt mail or certified return receipt mail, a certified copy of the summons and a
copy of the complaint in the above-styled case, to the defendant, _____.

On _____ I received the return receipt for said registered or
certified mail, which had been signed by _____ on _____.

Said return receipt is attached to this original summons and both documents are being sent herewith to
the Circuit Court Clerk for filing.

By: _____
PLAINTIFF, PLAINTIFF'S ATTORNEY
OR OTHER PERSON AUTHORIZED BY
STATUTE TO SERVE PROCESS

Sworn to and subscribed before me on this
_____ day of _____, 20____.

Notary Public or _____ Deputy Clerk
My Commission Expires: _____

**ATTACH
RETURN RECEIPT
HERE
(IF APPLICABLE)**

Served by (Print) Stinson
Process Server, S.C.S.O. 117 W. Smith St.
Gallatin, TN 37066 (615)442-1826

Document 6
2/15/2025 Order of Recusal

Case 3:25-cv-00468 Document 1-1 Filed 04/25/25 Page 35 of 53 PageID #: 38

CERTIFICATE OF SERVICE

I do hereby certify that a copy of the foregoing Order has been served *via* hand-delivery to the Honorable Dee David Gay; and

via electronic mail to:

Ben M. Rose
Rose Firm, PLLC
P.O. Box 1108
Brentwood, TN 37024
ben@rosefirm.com
Attorney for Plaintiff

Robert G. Wheeler, Jr
Law Office of Robert G. Wheeler, Jr.
740 C Conference Drive
P.O. Box 211
Goodlettsville, TN 37070
rob@rwheelerlaw.com
Attorney for City of Millersville

Bryan Morris
(no address provided)

Shawn Taylor
2049 Skyhawk Court
White House, TN 37188

Hand delivered:

Hon. Dee David Gay
Presiding Judge, 18th Judicial District

on this 14 day of February, 2025.



Deputy Clerk

Document 7
2/25/2025 Order Reassigning Case
to Judge Nichols

IN THE CIRCUIT COURT FOR SUMNER COUNTY, TENNESSEE, DIV. I
AT GALLATIN

RAY JUSTICE,
Plaintiff,

No. 83CC1-2025-CV-102

VS.

CITY OF MILLERSVILLE, TENNESSEE,
SHAWN TAYLOR, in his official capacities, and
BRYAN MORRIS, in his official capacities,

Defendants,

FILED
2:00 PM
FEB 25 2025
KATHRYN STRONG, CLERK
BY AS D.C.

ORDER

As Presiding Judge *pro tem* and pursuant to T.C.A. § 16-2-509(c) and Tennessee Supreme Court Rule 11, § III, the undersigned hereby assigns this matter to the Honorable Jennifer Nichols Court Judge, to hear to final disposition.

IT IS SO ORDERED.


Dee David Gay, Criminal Court Judge

CERTIFICATE OF SERVICE

I do hereby certify that a copy of the foregoing Order has been served *via* hand-delivery to the Honorable Jennifer Nichols; *via* U.S. Mail postage prepaid and/or electronic mail Pursuant to Tenn. R. Civ. P. 5.02(2)(a) to the following:

Judge Jennifer Nichols
c/o Rhonda Martin
Rhonda.Martin@tncourts.gov

Ben M. Rose
Rose Firm, PLLC
P.O. Box 1108
Brentwood, TN 27024
ben@rosefirm.com
Attorney for Petitioner

Robert G. Wheeler, Jr.
Law Office of Robert G. Wheeler, Jr.
740 C Conference Drive
P.O. Box 211
Goodlettsville, TN 37070
rob@rwheelerlaw.com
Attorney for City of Millersville

Bryan Morris
(no address provided)

Shawn Taylor
2049 Skyhawk Court
White House, TN 37188

on this 26 day of February, 2025.



DEPUTY CLERK

Document 8
3/5/2025 Summons Returned Not Served
Bryan Morris - Official Capacity

ORIGINAL

CIRCUIT COURT CIVIL SUMMONS

SUMNER COUNTY

STATE OF TENNESSEE
18TH JUDICIAL DISTRICT

☐ ORIGINAL
☒ ALIAS
☐ PLURIES

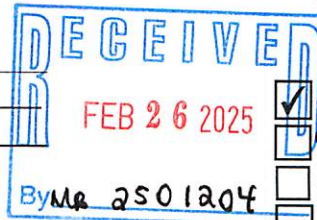
Ray Justice

Plaintiff(s)

vs. Case # 83CC1-2025-CV-102

Bryan Morris, Official Capacity
c/o Mayor Lincoln Atwood
1246 Louisville Highway, Millersville, Tennessee 37072

Defendant(s)



☒ Sumner County Sheriff (\$)
☐ Out of County Sheriff (\$)
☐ Secretary of State (\$)
☐ Commissioner of Insurance (\$)
☐ Private Process Server
☐ Certified Mail
(S) Attach Required Fees

TO THE ABOVE-NAMED DEFENDANT: Bryan Morris, Official Capacity

You are hereby summoned and required to defend a civil action by filing your answer with the Clerk of the Court and serving a copy of your answer to the Complaint on the plaintiff's attorney at the address below. Your defense must be made within thirty (30) days from the date this summons is served upon you, exclusive of the day of service. If you fail to defend this action by the above date, judgment by default can be rendered against you for the relief demanded in the complaint.

Issued: February 25th, 20 25.

KATHRYN STRONG, CLERK

By: [Signature] D.C.

ATTORNEY FOR PLAINTIFF
OR PLAINTIFF'S ADDRESS:

Name: Ben M. Rose, RoseFirm, PLLC
Address: Post Office Box 1108, Brentwood, Tennessee 37003

TO THE DEFENDANT(S): NOTICE: Pursuant to Chapter 919 of the Public Acts of 1980, you are hereby given the following notice: Tennessee law provides a ten thousand dollar (\$10,000) personal property exemption from execution or seizure to satisfy a judgment. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the Clerk of the Court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed. These include items of necessary wearing apparel (clothing) for yourself and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible and school books. Should any of these items be seized, you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer.

CERTIFICATION (IF APPLICABLE)

I, KATHRYN STRONG, Circuit Court Clerk, Sumner County, Tennessee, certify this to be a true and correct copy of the original Summons issued in this case.

KATHRYN STRONG, CLERK

FILED 9:00 AM

Date: _____

By: _____ MAR 06 2025



If you require assistance or modification due to a qualified disability, please contact the ADA Coordinator, Kim White at 615-451-6023.

KATHRYN STRONG, CLERK
BY [Signature] D.C.

RETURN ON SERVICE OF SUMMONS

I hereby certify and return that on the 5th day of March, 2025, I:

☐ Served this Summons and Complaint/Petition on the following Defendant, _____

_____ in the following manner: _____

☒ Failed to serve this Summons because Bryan Morris is not to be found in this County after diligent search and inquiry for the following reason(s): Millersville TN. City

Manager (Mike Gorham) advised Millersville TN. Atty →

This the 5th day of March, 2025.

→ Will not accept service due to Bryan Morris is no longer an employee.

D. Thompson #209/R.A.
DEPUTY SHERIFF/PROCESS SERVER

RETURN ON SERVICE OF SUMMONS BY MAIL

I hereby certify and return, that on the ___ day of _____, 20 __, I sent, postage prepaid, by registered return receipt mail or certified return receipt mail, a certified copy of the summons and a copy of the complaint in the above-styled case, to the defendant, _____.

On _____ I received the return receipt for said registered or certified mail, which had been signed by _____ on _____.

Said return receipt is attached to this original summons and both documents are being sent herewith to the Circuit Court Clerk for filing.

By: _____
PLAINTIFF, PLAINTIFF'S ATTORNEY
OR OTHER PERSON AUTHORIZED BY
STATUTE TO SERVE PROCESS

Sworn to and subscribed before me on this
_____ day of _____, 20____.

Notary Public or _____ Deputy Clerk
My Commission Expires: _____

**ATTACH
RETURN RECEIPT
HERE
(IF APPLICABLE)**

Document 9
03/05/2025 Summons Returned – Not Served
Shawn Taylor - Official Capacity

ORIGINAL

CIRCUIT COURT CIVIL SUMMONS

SUMNER COUNTY

STATE OF TENNESSEE
18TH JUDICIAL DISTRICT

☐ ORIGINAL
☒ ALIAS
☐ PLURIES

Ray Justice

RECEIVED
FEB 26 2025
By MB 2501204

Plaintiff(s)

vs. Case # 83CC1-2025-CV-102

Shawn Taylor, Official Capacity
c/o Mayor Lincoln Atwood
1246 Louisville Highway, Millersville, Tennessee 37072

Defendant(s)

☒ Sumner County Sheriff (\$)
☐ Out of County Sheriff (\$)
☐ Secretary of State (\$)
☐ Commissioner of Insurance (\$)
☐ Private Process Server
☐ Certified Mail
(\$ Attach Required Fees

TO THE ABOVE-NAMED DEFENDANT: Shawn Taylor, Official Capacity

You are hereby summoned and required to defend a civil action by filing your answer with the Clerk of the Court and serving a copy of your answer to the Complaint on the plaintiff's attorney at the address below. Your defense must be made within thirty (30) days from the date this summons is served upon you, exclusive of the day of service. If you fail to defend this action by the above date, judgment by default can be rendered against you for the relief demanded in the complaint.

Issued: February 25th, 20 25

KATHRYN STRONG, CLERK

By: [Signature] D.C.

ATTORNEY FOR PLAINTIFF
OR PLAINTIFF'S ADDRESS:

Name: Ben M. Rose, RoseFirm, PLLC

Address: Post Office Box 1108, Brentwood, Tennessee 37041

TO THE DEFENDANT(S): NOTICE: Pursuant to Chapter 919 of the Public Acts of 1980, you are hereby given the following notice: Tennessee law provides a ten thousand dollar (\$10,000) personal property exemption from execution or seizure to satisfy a judgment. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the Clerk of the Court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed. These include items of necessary wearing apparel (clothing) for yourself and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible and school books. Should any of these items be seized, you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer.

CERTIFICATION (IF APPLICABLE)

I, KATHRYN STRONG, Circuit Court Clerk, Sumner County, Tennessee, certify this to be a true and correct copy of the original Summons issued in this case.

KATHRYN STRONG, CLERK

Date: _____

By: _____ D.C. FILED 9:00 AM



If you require assistance or modification due to a qualified disability, please contact the ADA Coordinator, Kim White at 615-451-6023.

MAR 06 2025

KATHRYN STRONG, CLERK

RETURN ON SERVICE OF SUMMONS

I hereby certify and return that on the 5th day of March, 2025, I:

☐ Served this Summons and Complaint/Petition on the following Defendant, _____
_____ in the following manner: _____.

☒ Failed to serve this Summons because Shawn Taylor is not to be found
in this County after diligent search and inquiry for the following reason(s): Millersville TN, City
Manager (Mike Gorham) advised Millersville TN. Atty →

This the 5th day of March, 2025.

→ Will not accept service
due to Shawn Taylor is
no longer an employee.

R. Thompson #209
DEPUTY SHERIFF/PROCESS SERVER

RETURN ON SERVICE OF SUMMONS BY MAIL

I hereby certify and return, that on the ___ day of _____, 20 __, I sent, postage prepaid,
by registered return receipt mail or certified return receipt mail, a certified copy of the summons and a
copy of the complaint in the above-styled case, to the defendant, _____.

On _____ I received the return receipt for said registered or
certified mail, which had been signed by _____ on _____.

Said return receipt is attached to this original summons and both documents are being sent herewith to
the Circuit Court Clerk for filing.

By: _____
PLAINTIFF, PLAINTIFF'S ATTORNEY
OR OTHER PERSON AUTHORIZED BY
STATUTE TO SERVE PROCESS

Sworn to and subscribed before me on this
_____ day of _____, 20____.

Notary Public or _____ Deputy Clerk
My Commission Expires: _____

**ATTACH
RETURN RECEIPT
HERE
(IF APPLICABLE)**

Document 10
3/25/2025 Summons Returned Not Served
Shawn Taylor - Individual Capacity

ORIGINAL

CIRCUIT COURT CIVIL SUMMONS

SUMNER COUNTY

STATE OF TENNESSEE

☒ ORIGINAL

FILED 901a M 18TH JUDICIAL DISTRICT

☐ ALIAS

☐ PLURIES

Ray Justice

FEB 04 2025

JAN 30 2025

KATHRYN STRONG, CLERK

BY

Plaintiff(s)

By MB 2500583

☒ Sumner County Sheriff (\$)

☐ Out of County Sheriff (\$)

☐ Secretary of State (\$)

☐ Commissioner of Insurance (\$)

☐ Private Process Server

☐ Certified Mail

(\$ Attach Required Fees

vs. Case # 83CC1 - 20 25 - CV- 102

Shawn Taylor Individually
2049 Skyhawk Court
White House, TN 37188

Defendant(s)

TO THE ABOVE-NAMED DEFENDANT: Shawn Taylor, Individual Capacity

You are hereby summoned and required to defend a civil action by filing your answer with the Clerk of the Court and serving a copy of your answer to the Complaint on the plaintiff's attorney at the address below. Your defense must be made within thirty (30) days from the date this summons is served upon you, exclusive of the day of service. If you fail to defend this action by the above date, judgment by default can be rendered against you for the relief demanded in the complaint.

Issued: Jan. 28, 20 25.

KATHRYN STRONG, CLERK

By: Kreehand D.C.

ATTORNEY FOR PLAINTIFF

OR PLAINTIFF'S ADDRESS:

Name: Ben M. Rose, RoseFirm, PLLC

Address: Post Office Box 1108, Brentwood, Tennessee 370

TO THE DEFENDANT(S): NOTICE: Pursuant to Chapter 919 of the Public Acts of 1980, you are hereby given the following notice: Tennessee law provides a ten thousand dollar (\$10,000) personal property exemption from execution or seizure to satisfy a judgment. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the Clerk of the Court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed. These include items of necessary wearing apparel (clothing) for yourself and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible and school books. Should any of these items be seized, you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer.

CERTIFICATION (IF APPLICABLE)

I, KATHRYN STRONG, Circuit Court Clerk, Sumner County, Tennessee, certify this to be a true and correct copy of the original Summons issued in this case.

KATHRYN STRONG, CLERK

Date: _____

By: _____ D.C.



If you require assistance or modification due to a qualified disability, please contact the ADA Coordinator, Kim White at 615-451-6023.

RETURN ON SERVICE OF SUMMONS

I hereby certify and return that on the 3rd day of February, 2025, I:

☐ Served this Summons and Complaint/Petition on the following Defendant, _____
_____ in the following manner: _____.

☒ Failed to serve this Summons because Shawn Taylor, Individual is not to be found
in this County after diligent search and inquiry for the following reason(s): said address is
not in Sumner Co. TN.

This the 3rd day of February, 2025.

Rick Thompson
S.C.S.O. 117 W. Smith St.
Gallatin, TN 37066
615-452-2616

R. Thompson #209/R. A.
DEPUTY SHERIFF/PROCESS SERVER

RETURN ON SERVICE OF SUMMONS BY MAIL

I hereby certify and return, that on the ___ day of _____, 20 __, I sent, postage prepaid,
by registered return receipt mail or certified return receipt mail, a certified copy of the summons and a
copy of the complaint in the above-styled case, to the defendant, _____.

On _____ I received the return receipt for said registered or
certified mail, which had been signed by _____ on _____.

Said return receipt is attached to this original summons and both documents are being sent herewith to
the Circuit Court Clerk for filing.

By: _____
PLAINTIFF, PLAINTIFF'S ATTORNEY
OR OTHER PERSON AUTHORIZED BY
STATUTE TO SERVE PROCESS

Sworn to and subscribed before me on this
_____ day of _____, 20____.

Notary Public or _____ Deputy Clerk
My Commission Expires: _____

**ATTACH
RETURN RECEIPT
HERE
(IF APPLICABLE)**



COPY

CIRCUIT COURT CIVIL SUMMONS

SUMNER COUNTY

STATE OF TENNESSEE
18TH JUDICIAL DISTRICT☒ ORIGINAL☐ ALIAS☐ PLURIES

Ray Justice

Plaintiff(s)

vs. Case # 83CC1 - 20 25 - CV- 102

Shawn Taylor Individually
2049 Skyhawk Court
White House TN 37188

Defendant(s)

- ☒ Sumner County Sheriff (\$)
☐ Out of County Sheriff (\$)
☐ Secretary of State (\$)
☐ Commissioner of Insurance (\$)
☐ Private Process Server
☐ Certified Mail
 (\$) Attach Required Fees

TO THE ABOVE-NAMED DEFENDANT: Shawn Taylor, Individual Capacity

You are hereby summoned and required to defend a civil action by filing your answer with the Clerk of the Court and serving a copy of your answer to the Complaint on the plaintiff's attorney at the address below. Your defense must be made within thirty (30) days from the date this summons is served upon you, exclusive of the day of service. If you fail to defend this action by the above date, judgment by default can be rendered against you for the relief demanded in the complaint.

Issued: Jan 28, 20 25.

KATHRYN STRONG, CLERK

By: Freehand D.C.

ATTORNEY FOR PLAINTIFF

OR PLAINTIFF'S ADDRESS:

Name: Ben M. Rose, RoseFirm, PLLC

Address: Post Office Box 1108, Brentwood, Tennessee 370

TO THE DEFENDANT(S): NOTICE: Pursuant to Chapter 919 of the Public Acts of 1980, you are hereby given the following notice: Tennessee law provides a ten thousand dollar (\$10,000) personal property exemption from execution or seizure to satisfy a judgment. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the Clerk of the Court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed. These include items of necessary wearing apparel (clothing) for yourself and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible and school books. Should any of these items be seized, you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer.

CERTIFICATION (IF APPLICABLE)

I, KATHRYN STRONG, Circuit Court Clerk, Sumner County, Tennessee, certify this to be a true and correct copy of the original Summons issued in this case.

KATHRYN STRONG, CLERK

Date: _____

By: _____ D.C.



If you require assistance or modification due to a qualified disability, please contact the ADA Coordinator, Kim White at 615-451-6023.

RETURN ON SERVICE OF SUMMONS

I hereby certify and return that on the ____ day of _____, 20____, I:

☐ Served this Summons and Complaint/Petition on the following Defendant, _____
_____ in the following manner: _____.

☐ Failed to serve this Summons because _____ is not to be found
in this County after diligent search and inquiry for the following reason(s): _____.

This the ____ day of _____, 20____.

DEPUTY SHERIFF/PROCESS SERVER

RETURN ON SERVICE OF SUMMONS BY MAIL

I hereby certify and return, that on the __ day of _____, 20 __, I sent, postage prepaid,
by registered return receipt mail or certified return receipt mail, a certified copy of the summons and a
copy of the complaint in the above-styled case, to the defendant, _____.

On _____ I received the return receipt for said registered or
certified mail, which had been signed by _____ on _____.

Said return receipt is attached to this original summons and both documents are being sent herewith to
the Circuit Court Clerk for filing.

By: _____
PLAINTIFF, PLAINTIFF'S ATTORNEY
OR OTHER PERSON AUTHORIZED BY
STATUTE TO SERVE PROCESS

Sworn to and subscribed before me on this
____ day of _____, 20____.

____ Notary Public or ____ Deputy Clerk
My Commission Expires: _____

**ATTACH
RETURN RECEIPT
HERE
(IF APPLICABLE)**

Document 11
3/28/25 Notice of Appearance
City of Millersville

IN THE CIRCUIT COURT OF SUMNER COUNTY, TENNESSEE
FOR THE EIGHTEENTH JUDICIAL DISTRICT AT GALLATIN

RAY JUSTICE,

Plaintiff,

v.

CITY OF MILLERSVILLE, TENNESSEE,
SHAWN TAYLOR, in his official and
individual capacities, and BRYAN MORRIS,
in his official and individual capacities,

Defendants.

No. 83CC1-2025-CV-102

FILED
11:40 A M

MAR 28 2025

KATHRYN STRONG, CLERK
BY pm D.C.

NOTICE OF APPEARANCE

COMES NOW Geoffrey A. Lindley and requests that he be entered as counsel of record for Defendant City of Millersville, Tennessee, in the above styled matter. This request is made on behalf of Defendant without waiving, but while specifically reserving, all defenses to which Defendant is entitled.

Respectfully submitted,

RAINEY, KIZER, REVIERE & BELL, P.L.C.

By:

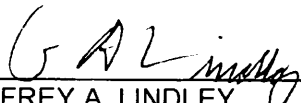
GA Lindley
GEOFFREY A. LINDLEY (BPR No. 021574)
Attorneys for Defendant City of Millersville
209 East Main Street
P.O. Box 1147
Jackson, Tennessee 38302-1147
(731) 423-2414
glindley@raineykizer.com

CERTIFICATE OF SERVICE

The undersigned certifies that a true copy of this pleading or document was served upon the following via email and USPS:

Ben M. Rose (BPR No. 21254)
ROSE FIRM, PLLC
Attorney for Plaintiff Ray Justice
P.O. Box 1108
Brentwood, TN 37024
(615) 942-8295
ben@rosefirm.com

This the 28th day of March, 2025.



GEOFFREY A. LINDLEY